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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

TO BE FILED UNDER SEAL

- against -

MICHAEL MATTHEWS,

AFFIDAVIT AND COMPLAINT
IN SUPPORT OF AN ARREST
WARRANT

Defendant.

(18 U.S.C. § 2113(a))

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Case No. 18-M-1043

EASTERN DISTRICT OF NEW YORK, SS:

PAUL COURTNEY, being duly sworn, deposes and states that he is a Task Force Officer with the Federal Bureau of Investigation, duly appointed according to law and acting as such.

On or about October 1, 2018, within the Eastern District of New York, the defendant MICHAEL MATTHEWS did knowingly and intentionally take and attempt to take by force, violence and intimidation, from the person and presence of another, money belonging to and in the care, custody, control, management and possession of a bank or other financial institution, to wit: Capitol One Bank, the deposits of which are insured by the Federal Deposit Insurance Corporation.

(Title 18, United States Code, Section 2113(a))

On or about October 12, 2018, within the Eastern District of New York, the defendant MICHAEL MATTHEWS did knowingly and intentionally take and attempt to take by force, violence and intimidation, from the person and presence of another, money belonging to and in the care, custody, control, management and possession of a bank or other

financial institution, to wit: Capitol One Bank, the deposits of which are insured by the Federal Deposit Insurance Corporation.

(Title 18, United States Code, Section 2113(a))

On or about October 12, 2018, within the Eastern District of New York, the defendant MICHAEL MATTHEWS did knowingly and intentionally take and attempt to take by force, violence and intimidation, from the person and presence of another, money belonging to and in the care, custody, control, management and possession of a bank or other financial institution, to wit: Citibank, the deposits of which are insured by the Federal Deposit Insurance Corporation.

(Title 18, United States Code, Section 2113(a))

The source of your deponent's information and the grounds for his belief are as follows:¹

1. I am a Task Force Officer with the Federal Bureau of Investigation ("FBI") and have been involved in the investigation of numerous bank robberies. I am also a Detective with the New York City Police Department ("NYPD"). I am familiar with the facts and circumstances set forth below from my participation in the investigation; my review of the investigative file, including the defendant's criminal history record; and from reports of other law enforcement officers involved in the investigation.

2. On or about October 1, 2018, at approximately 12:05 p.m., the defendant MICHAEL MATTHEWS, who was subsequently identified as described below,

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

entered a Capitol One Bank branch located at 31-17 Broadway, Queens, New York (the “Capitol One Bank”). MATTHEWS approached a teller and passed a demand note to the teller that read, “GIVE ME THE MONEY I HAVE A GUN DON’T MAKE ME SHOOT YOU MAKE IT QUICK NO DYE PACKS.” The teller handed MATTHEWS approximately \$2,071 in cash, and MATTHEWS fled the location.

3. On or about October 12, 2018, at approximately 1:45 p.m., the defendant MICHAEL MATTHEWS, who was subsequently identified as described below, returned to the same Capitol One Bank branch and proceeded to a teller window. MATTHEWS verbally stated to the teller, “You know what this is, don’t pull the button,” and then passed her a demand note which read, “GIVE ME THE MONEY I HAVE A GUN DON’T MAKE ME SHOOT YOU MAKE IT QUICK NO DYE PACKS.” The teller handed MATTHEWS approximately \$99 in cash, and MATTHEWS fled the location.

4. On or about October 12, 2018, at approximately 3:55 p.m., the defendant MICHAEL MATTHEWS, who was subsequently identified as described below, entered a Citibank branch located at 87-11 Queens Boulevard, Queens, New York (“the Citibank”) and proceeded to a teller window. MATTHEWS passed the teller a demand note which read, “GIVE ME THE MONEY I HAVE A GUN + KNIFE DON’T MAKE ME USE IT! NO DYE PACKS!” MATTHEWS verbally stated to the teller, Give me all your fuckin money, I’m not playing I have a gun.” The teller silently triggered the bank’s alarm and handed MATTHEWS approximately \$1,100 in cash.

5. Before MATTHEWS could leave the Citibank, an off-duty New York City Corrections Officers (the “Witness”) who was inside the bank attempted to stop MATTHEWS and place him under arrest. MATTHEWS punched and kicked the Witness

and fled from the Citibank. The Witness followed MATTHEWS to the corner of 55th Avenue and Queens Boulevard, Queens, New York, where MATTHEWS continued to fight against the Witness, causing physical injuries including a fracture to the Witness's wrist. Soon thereafter, NYPD officers responding to the Citibank alarm arrived and placed MATTHEWS under arrest. The officers recovered approximately \$1206.06 from the defendant's pants' pocket.

6. Law enforcement agents recovered surveillance camera footage from the October 1 and October 12 robberies at the Capitol One Bank, and from the October 12 robbery at the Citibank. Law enforcement agents compared the images from the robberies and observed that the perpetrator of all three robberies was an older white male wearing a blue baseball cap with no writing on it, dark sunglasses, dark sneakers, and carrying a black backpack. The perpetrator of all three robberies had the same height and build. Law enforcement agents compared the images of the perpetrator of the robberies to MATTHEWS and determined that MATTHEWS was the individual featured in the images.

7. Law enforcement agents compared the demand notes presented by the perpetrator during all three robberies, and observed that all three notes were written in blue ink on a torn piece of lined notebook paper, and that the handwriting appeared to be identical in all three notes. Law enforcement agents were aware of MATTHEWS because, among other things, he had been previously convicted in the Southern District of New York for a series of bank robberies that occurred in 2011 and which followed the same pattern, including similarly worded demand notes.

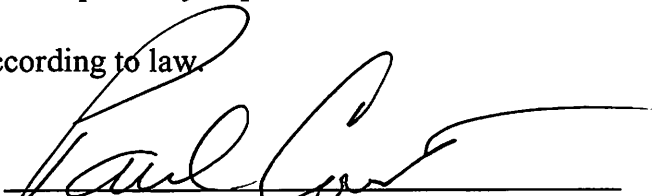
8. Following his arrest on October 12, 2018, the defendant was read his Miranda warnings, which he waived. The defendant admitted in substance to committing the

October 1 and October 12 robberies at Capitol One Bank and the October 12 robbery at Citibank. The defendant also signed images taken from the surveillance videos from all three of those robberies, indicating that he was the individual pictured in those images.


9. I have confirmed that the deposits of Capitol One Bank and Citibank are insured by the Federal Deposit Insurance Corporation.

10. I request that the Court issue an order sealing, until further order of the Court, all papers submitted in support of this application, including the affidavit and arrest warrant. Based upon my training and experience, I have learned that criminals actively search for criminal affidavits and arrest warrants via the internet. Therefore, premature disclosure of the contents of this affidavit and related documents will seriously jeopardize the investigation, including by giving targets an opportunity to flee or continue flight from prosecution, destroy or tamper with evidence and change patterns of behavior.

WHEREFORE, your deponent respectfully requests that the defendant
MICHAEL MATTHEWS, be dealt with according to law.


PAUL COURTNEY
Task Force Officer
Federal Bureau of Investigation

Sworn to before me this
31st day of October, 2018


THE HONORABLE
UNITED STATES
EASTERN DISTRICT OF
S/ Lois Bloom
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